

IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MASSACHUSETTS

LIBERTY MUTUAL INSURANCE)	
COMPANY AND SUBSIDIARIES,)	
)	
Plaintiff,)	
)	
v.)	Civil No. 05-11048-RCL
)	
UNITED STATES OF AMERICA,)	
)	
Defendant.)	

ASSENTED TO MOTION TO EXTEND TIME TO ANSWER

The United States of America, through undersigned counsel, moves to extend the deadline for answering the Complaint for a period of thirty (30) days to and including November 7, 2005. This is the second request for an extension by the United States to answer. The grounds for this motion are Government counsel has not received the administrative file from the Internal Revenue Service, and will require it in order to prepare a meaningful answer. The administrative file has been located, however, government counsel has yet to receive the file.

Government counsel has spoken to counsel for the Plaintiff who has assented to the granting of this motion.

MICHAEL J. SULLIVAN
United States Attorney

/s/ Stephen J. Turanchik

STEPHEN J. TURANCHIK
Trial Attorney, Tax Division
U.S. Department of Justice
Post Office Box 55
Ben Franklin Station
Washington, D.C. 20044
Telephone: (202) 307-6565
stephen.j.turanchik@usdoj.gov

CERTIFICATE OF SERVICE

IT IS HEREBY CERTIFIED that service of the foregoing Assented to Motion to Extend Time to Answer has been made upon the following by depositing a copy in the United States mail, postage prepaid, this 6th day of October:

Peter Winslow
Scribner, Hall & Thompson LLP
1875 Eye Street, NW
Washington, DC 20006

John A. Lacaire
Biack, Cetkovic & Whitestone
200 Berkley Street, Floor 16
Boston, MA 02116

/s/ Stephen J. Turanchik

STEPHEN J. TURANCHIK
Trial Attorney, Tax Division
U.S. Department of Justice
Post Office Box 55
Ben Franklin Station
Washington, D.C. 20044
Telephone: (202) 307-6565